

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

U.S.A. FANTER CORPORATION, LTD., : CIVIL CASE NO. 1:20-CV-00003
Plaintiff, :
-v- :
IMPERIAL PACIFIC INTERNATIONAL :
(CNMI), LLC, :
Defendant. :

MOTION FOR REIMBURSEMENT OF EXPENSES

Clear Management, Ltd., hereby respectfully moves that this Honorable Court authorize and direct the disbursement of expenses incurred by the Receiver from April 1 through April 30, 2023, in the amount of \$27,435.93. A table detailing those expenses is attached hereto and submitted herewith.

DATED: 17 MAY 2023



MICHAEL A. WHITE, ESQ.
Attorney for Clear Management, Ltd.

CLEAR MANAGEMENT - RECEIVER'S EXPENSES - From 1st April 2023 to 30th April 2023

Invoice Details	Invoiced by	Invoice Reference	Project Mgt	Technical Advisory	Labour	Legal Fees	Equipment	Fuel for Generator	Travel Expenses	Web Site	Other Expenses	Invoice Total
Kevin Stopforth Expenses from 27th March to 3rd April	Kevin Stopforth	1							\$ 300.13			\$ 300.13
Kevin Stopforth Fees 27th March to 3rd April (5 Days)	Kevin Stopforth	2		\$ 2,000.00								\$ 2,000.00
Kevin Stopforth Bank Charges on Receipts	Kevin Stopforth	-										\$ 32.00
Bank Charges on Transfer to Kevin Stopforth	Verlink Investment	-									\$ 63.70	\$ 63.70
Time & Expenses - 2 Weeks to 2023-04-09	Chris Craney	3	\$ 1,960.00									\$ 1,960.00
Time & Expenses - 2 Weeks to 2023-04-09	Kien Truong	4			\$ 840.00							\$ 840.00
Gas for Generator - 31st March & 4th April	Mobil	5						\$ 53.77				\$ 53.77
Chris Craney Bank Charges on Trf to KT	Chris Craney	-										\$ 13.00
Kevin Stopforth Expenses from 4th April to 10th April	Kevin Stopforth	6										\$ 356.08
Kevin Stopforth Fees 4th April to 10th April (4 Days)	Kevin Stopforth	7		\$ 1,600.00								\$ 1,600.00
Bank Charges on Transfer to Kevin Stopforth	Verlink Investment	-										\$ 63.70
Kevin Stopforth Expenses from 11th April to 16th April	Kevin Stopforth	8							\$ 420.43			\$ 420.43
Kevin Stopforth Fees 4th April to 10th April (4 Days)	Kevin Stopforth	9		\$ 1,600.00								\$ 1,600.00
Bank Charges on Transfer to Kevin Stopforth	Verlink Investment	-										\$ 63.70
Time & Expenses - 2 Weeks to 2023-04-23	Chris Craney	10	\$ 2,415.00					\$ 51.23				\$ 51.23
Time & Expenses - 2 Weeks to 2023-04-23	Kien Truong	11			\$ 1,675.00							\$ 1,675.00
Time & Expenses - 2 Weeks to 2023-04-23	Avelino Dungca	12			\$ 408.00							\$ 408.00
Time & Expenses - 2 Weeks to 2023-04-23	Mario Brei	12			\$ 312.00							\$ 312.00
Time & Expenses - 2 Weeks to 2023-04-23	Shawn Mendiola	12			\$ 364.00							\$ 364.00
Gas for Generator - 10th April & 20th April	Mobil	13										\$ 51.23
Bank Charges on Fund Transfer to Chris Craney	Verlink Investment	-										\$ 9.56
Kevin Stopforth Expenses from 17th April to 23rd April	Kevin Stopforth	14							\$ 418.37			\$ 418.37
Kevin Stopforth Fees 17th April to 23rd April (5 Days)	Kevin Stopforth	15		\$ 2,000.00								\$ 2,000.00
Bank Charges on Transfer to Kevin Stopforth	Verlink Investment	-										\$ 63.71
Kevin Stopforth Expenses from 24th April to 30th April	Kevin Stopforth	16							\$ 371.54			\$ 371.54
Kevin Stopforth Fees 24th April to 30th April (5 Days)	Kevin Stopforth	17		\$ 2,000.00								\$ 2,000.00
Time & Expenses - 1 Week to 2023-04-30	Avelino Dungca	18			\$ 438.00							\$ 438.00
Time & Expenses - 1 Week to 2023-04-30	Mario Brei	18			\$ 420.00							\$ 420.00
Chris Craney Bank Charges on Receipt of Funds	Chris Craney	-										\$ 25.00
Kevin Hotel in Saipan 1st - 11th April (\$814.56)	Hotels.com	19							\$ 1,018.19			\$ 1,018.19
Kevin Hotel in Saipan 13th - 22nd April (£723.00)	Hotels.com	20							\$ 903.75			\$ 903.75
Kevin Hotel in Saipan 23rd - 30th April (£660.16)	Hotels.com	21							\$ 812.70			\$ 812.70
Kevin Hotel in Saipan 1st - 4th May (£300.80)	Hotels.com	22							\$ 376.00			\$ 376.00
TS Expenses re Trip to VN & Cambodia - Bidder Discussions	Tim Shepherd	23							\$ 3,967.37			\$ 3,967.37
Total from 1st April 2023 to 30th April 2023			\$ 4,375.00	\$ 9,200.00	\$ 4,477.00	-	-	\$ 105.00	\$ 8,944.56	-	\$ 334.37	\$ 27,435.93

Project Mgt	\$ 4,375.00
Technical Advisory	\$ 9,200.00
Labour	\$ 4,477.00
Legal Fees	-
Equipment	-
Fuel for Generator	\$ 105.00
Travel Expenses	\$ 8,944.56
Web Site	-
Other Expenses	\$ 334.37
Total	\$ 27,435.93